## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING PHARMACY CASES	Master Docket No.12-12052-FDS
This Document Relates To:	
ROBERT COLE, ON BEHALF OF HIMSELF AND ALL OTHERS SIMILARLY SITUATED,	CASE NO. 1:12-cv-12066
Plaintiff, )	
v. )	
NEW ENGLAND COMPOUNDING PHARMACY, INC. D/B/A NEW ENGLAND COMPOUNDING CENTER, AMERIDOSE LLC, MEDICAL SALES MANAGEMENT INC., BARRY CADDEN, LISA CONIGLIARO CADDEN, GREGORY CONIGLIARO, DOUGLAS CONIGLIARO, CARLA CONIGLIARO, AND GLENN A. CHIN,	
Defendants.	

## ASSENTED TO MOTION FOR AN EXTENSION OF TIME TO FEBRUARY 20, 2013 TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT

Defendants Barry Cadden, Lisa Conigliaro Cadden, Gregory Conigliaro, Douglas Conigliaro, Carla Conigliaro, and Glenn A. Chin (collectively, "Defendants") move this Court for an extension of time to February 20, 2013 for Defendants to answer or otherwise move. The motion should be granted because Defendants require additional time to respond to the allegations and have acted in good faith. Moreover, Plaintiff has assented to the motion. In further support of the motion, Defendants attach a memorandum of law.

WHEREFORE, Barry Cadden, Lisa Conigliaro Cadden, Gregory Conigliaro, Douglas

Conigliaro, Carla Conigliaro, and Glenn A. Chin request that the Court grant the Motion for An

Extension of Time to February 20, 2013 to Respond to the Plaintiff's Amended Complaint.

Respectfully submitted,

Defendants Barry Cadden, Lisa Conigliaro Cadden, Gregory Conigliaro, Douglas Conigliaro, Carla Conigliaro, and Glenn A. Chin,

By their Attorneys,

/s/ Daniel E. Tranen

Geoffrey M. Coan, BBO # 641998 Daniel E. Tranen, BBO # 675240 Hinshaw & Culbertson LLP 28 State Street, 24th Floor Boston, MA 02109-1775

January 23, 2013 Tel: (617)213-7000 / Fax: (617)213-7001

## **CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

In accordance with Local Rule 7.1(a)(2), I, Garrett D. Lee, do hereby certify that I conferred with Plaintiff's counsel regarding Defendants' Assented To Motion for an Extension of Time to February 20, 2013 to Respond to the Plaintiff's Amended Complaint.

Dated: January 23, 2013 /s/ Garrett D. Lee
Garrett D. Lee

Date:

## **CERTIFICATE OF SERVICE**

I, Daniel E. Tranen, hereby certify that on January 23, 2013, the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Daniel E. Tranen
Daniel E. Tranen